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 FSB and Ken Thompson

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

CESAR ANCHANTE-MARTINETTI

Sramineus Homo, US Vessel,

Libellant,

v.

WORLD SAVINGS, KEN THOMPSON,
 President, U.S. Vessel DOES, ROES, and MOES
 1-100 et al, US Vessel sand,

Libellees,

No.: CV 07-5929

**REPLY IN SUPPORT OF DEFENDANTS'
 MOTION TO DISMISS**

Date: February 1, 2008

Time: 9:00 a.m.

Place: Courtroom 10

Compl. Filed: November 26, 2007

Honorable Susan Illston

Cesar Anchante-Martinetti
 Lien Holder of the Vessel, the Real Party
 In Interest, Lawful Man
 Injured Third Party Intervener/Petitioner/
 Libellant,

v.

WORLD SAVINGS, KEN THOMPSON,
 PRESIDENT, U.S. Vessel
 DOES, ROES and MOES 1-100 et al

**US VESSELS
 INDIVIDUALLY AND SEVERALLY,**

Third Party Defendants/Libellees

REED SMITH LLP
 A limited liability partnership formed in the State of Delaware

Consistent with his nonsensical “Complaint” Cesar Anchante-Martinetti’s (“Plaintiff”) “Opposition” to Defendants’ World Savings Bank, FSB (erroneously sued as “World Savings”) and its President, Ken Thompson’s Motion To Dismiss is void of a any coherent factual or legal argument. The closest Plaintiff comes to articulating a coherent thought is when he attempts to appoint Defendants’ counsel as his “co-fiduciaries.” See Notice of Appointment of Co-Fiduciaries, p. 2. Plaintiff’s rambling Affidavit, Memorandum, Appointment of Co-Fiduciaries and Judicial Notice Perfected Counterclaim and Notice of Setoff and Adjustment by Administrative Procedure served in response to World’s Motion to Dismiss exemplify why the Court should dismiss the instant action. It is clearly designed to harass Defendants and has, thus far, succeeded in forcing them to waste resources to defend against a frivolous lawsuit not grounded in reality. Plaintiff has not and cannot state a cause of action against Defendants. Plaintiff’s Complaint is also deficient in that it fails to plead any claim with specificity or demonstrate the basis for this Court’s jurisdiction. Thus, the Court should not hesitate to dismiss Plaintiff’s Complaint with prejudice.

DATED: January 17, 2008.

REED SMITH LLP

By /s/ Keith D. Yandell
 Jack R. Nelson
 Keith D. Yandell
 Attorneys for Defendants World Savings Bank,
 FSB and Ken Thompson

PROOF OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. I am employed in the office of a member of the bar of this court at whose direction the service was made. My business address is REED SMITH LLP, 1999 Harrison Street, Suite 2400, Oakland, CA 94612-3572. On January 18, 2008, I served the following document(s) by the method indicated below:

REPLY IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS

- ☒ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Oakland, California addressed as set forth below. I am readily familiar with the firm's practice of collection and processing of correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in this Declaration.

Cesar Anchante-Martinetti 324 Stevenson Street Vacaville, CA 95688	Cesar Anchante-Martinetti 6787 Hillview Drive Vacaville, CA 95688
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I declare under penalty of perjury under the laws of the United States that the above is true and correct. Executed on January 18, 2008, at Oakland, California.

/s/ David P. Kelley